

Responses to
Colorado Department of Health
Comments on
Revised Final Phase I RFI/RI Work Plan
Inside Building Closures
(Operable Unit 15)
U.S. Department of Energy
January 15, 1993

Comment 1: EPA's previous comment, which addressed closure of RCRA Unit 63, requires modification of the Executive Summary and clarification by the Division. Part VIII of the Mixed Residue Permit Modification is pending final review by the Division. Part VIII contains closure plans for Unit 63, which specifically addresses radioactive contamination and cleanup of the unit. In order to ensure that CERCLA requirements for radionuclides are addressed, the division will see that these plans remain in the mixed Residue Permit Modification. Please add to page ES-2 sentences that state that inclusion of RFI/RI work for Unit 63 in the Mixed Residue Permit Modification does not remove IHSS 212 from the IAG; that any necessary corrective action beyond the IHSS will be performed pursuant to the IAG; and that DOE will eventually need to issue a CERCLA decision document to close the unit.

Response. The document has been revised to indicate that inclusion of RFI/RI work for Unit 63 in the Mixed Residue Permit Modification does not remove IHSS 212 from the IAG; that any necessary corrective action beyond the IHSS will be performed pursuant to the IAG; and that DOE will eventually need to issue a CERCLA decision document to close the unit.

Comment 2: Please check the list of Operating Procedures on Page 11-1 against those listed in revised Table 10-1.

Response: The document has been modified to ensure consistency between Table 10-1 and the list of operating procedures on Page 11-1.